

Stephen H.M. Bloch (#7813)
Laura Peterson (#16135)
Hanna Larsen (#18458)
SOUTHERN UTAH WILDERNESS ALLIANCE
425 East 100 South
Salt Lake City, Utah 84111
Telephone: (801) 486-3161
Facsimile: (801) 486-4233
steve@suwa.org
laura@suwa.org
hanna@suwa.org

*Attorneys for Defendant-Intervenor
Southern Utah Wilderness Alliance*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

STATE OF UTAH, et al.,

Plaintiffs,

v.

DEB HAALAND, et al.,

Defendants,

and

**SOUTHERN UTAH WILDERNESS
ALLIANCE,**

Defendant-Intervenor.

Case No. 2:24-cv-00172-TS-DAO

**DEFENDANT-INTERVENOR
SOUTHERN UTAH WILDERNESS
ALLIANCE'S RESPONSE TO
PLAINTIFFS' AMENDED COMPLAINT**

District Judge Ted Stewart
Magistrate Judge Daphne A. Oberg

Pursuant to DUCivR 7-4(b)(2), Defendant-Intervenor Southern Utah Wilderness Alliance (SUWA), through counsel, hereby responds to Plaintiffs' Complaint in the above-captioned matter: the Bureau of Land Management's San Rafael Desert Travel Management Plan:

Reconsideration of Routes as Required by the 2022 Settlement Agreement is neither arbitrary nor capricious and is instead supported by substantial evidence.

SUWA also raises the following affirmative defenses:

1. Plaintiffs fail to state a claim upon which relief may be granted for all or some of the claims in the Complaint.
2. All or some of the claims in Plaintiffs' Amended Complaint are not justiciable.
3. Plaintiffs' lack standing to assert all or some of the claims in the Amended Complaint.

Respectfully Submitted October 17, 2024.

/s/ Hanna Larsen
Hanna Larsen
Stephen Bloch
Laura Peterson

*Attorneys for Defendant-Intervenor
Southern Utah Wilderness Alliance*